## UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

| JANE DOES | 1-9,        |
|-----------|-------------|
|           | Plaintiffs, |

VS.

COLLINS MURPHY, et al. Defendants.

Case No.: 7:20-cv-00947

## **DECLARATION OF CONSTANTINOS CHRISTOFOROU**

Constantinos Christoforou being duly sworn, does hereby depose and state:

- 1. My name is Constantinos Christoforou. Unless otherwise stated, I make this affidavit of my own personal knowledge.
  - 2. I am a Director of Wisebits, Ltd. ("WL").
- WL is incorporated in Cyprus, with its principal place of business in Limassol,
  Cyprus.
- 4. Contrary to the allegations in the complaint, WL does not conduct business in the United States or South Carolina.
- 5. WL does not now have an office in South Carolina, nor has it ever had an office in South Carolina.
- 6. WL does not have an office in the United States, nor has it ever had an office in the United States.
- 7. WL does not have (and has never had) any employees in South Carolina or the United States.

- 8. WL does not maintain a bank account in South Carolina or the United States, nor has it ever had such an account.
- 9. WL does not pay taxes in South Carolina or the United States, nor has it ever done so.

Signed under the pains and penalties of perjury this 33 day of December, 2022.

Constantinos Christoforou, Director Wisebits, Ltd.